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8 *Attorneys for Defendants State of California,*
by and through its California Highway Patrol;
9 *Commissioner Joseph A. Farrow;*
10 *Officer Jose Ortega; and Officer Timothy J. Brown*

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 CIVIL DIVISION

14
15 **ESTRELLA LYSANDRA ZAYAS,**

16 Plaintiff,

17 v.

18 **STATE OF CALIFORNIA, ET AL,**

19 Defendants.
20

Case No. 3:17-cv-02739

**STIPULATION TO PROTECTIVE ORDER
AND [Proposed] ORDER**

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Dept: 5
Judge: The Honorable Edward M. Chen
Trial Date: Not yet assigned
Action Filed: May 11, 2017

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STIPULATION

Therefore, the parties to this action, by and through their respective counsel, hereby stipulate that the following writings (and any other records or documents which the parties stipulate in writing to be subject to this Protective Order) may only be disclosed to plaintiffs, their experts and their counsel:

- Production of the documents listed above will be subject to the following conditions and the Court's Protective Order:

2. The documents and their contents may not be disclosed, copied, distributed, shown, described, or read to any person or entity (including, but not limited to, media representatives) by

1 plaintiff or her representatives or agents, other than (a) the parties to this litigation; (b) the parties'
2 attorneys, paralegals, and legal office staff in this litigation; (c) the parties' expert consultants in
3 this litigation for purposes of expert consultation and trial testimony preparation; and (d) the court
4 in this action, filed under seal, for purposes of this litigation.

5 3. The plaintiff's expert consultants must sign an acknowledgment and agreement to be
6 bound by the terms of this Protective Order, an executed copy of which will be provided to
7 defendants' counsel within seven (7) days after formal disclosure of such consultants as expert
8 witnesses in this litigation. The acknowledgment and agreement must contain the following
9 language:

10 "As an expert witness for the plaintiffs in this lawsuit, I hereby acknowledge
11 receipt of a copy of the signed Stipulation to Protective Order, and Order, approved
12 and entered by the Court in this action, and I agree to be bound by all terms and
13 conditions in that Protective Order and recognize that I may be personally found in
contempt of Court or subject to other sanctions determined by the Court should I
violate any term or condition in that Protective Order."

14 4. All documents produced subject to this Stipulation and Protective Order and copies
15 thereof will be clearly marked "Confidential" to indicate that they are subject to this Protective
16 Order.

17 5. All documents produced subject to this Stipulation and Protective Order and copies
18 thereof must be returned to defendants' counsel upon the termination of this litigation.

19 6. This Protective Order does not in any way affect or prejudice the right of any party at
20 the time of trial or other proceedings in this action to object to the use or admissibility of said
21 documents at the trial or in other proceedings.

22 7. Any writings or other documents stipulated in writing by the parties to be confidential
23 and marked "Confidential," and produced prior to the date the Protective Order is signed by the
24 Court, shall also be subject to all terms of this Stipulation and Protective Order.

25 8. If any party intends to file a motion that includes as an exhibit any writing(s) subject
26 to this protective order, that party must file the writing(s) under seal pursuant to Northern District
27 Civil Local Rule 79-5.
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1 9. Violation of this Protective Order by any party or any other person, including but not
2 limited to any party's expert witnesses and consultants, will result in sanctions to be determined
3 by the Court upon application by any other party.

4 **SO STIPULATED:**

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6 Dated: August 10, 2017

LAW OFFICES OF PANOS LAGOS

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8 /s/Panos Lagos
Panos Lagos, Esq.
Attorney for Plaintiff,
ESTRELLA LYSANDRA ZAYAS

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11 Dated: August 9, 2017

XAVIER BECERRA
Attorney General of California
JEFFREY R. VINCENT
Supervising Deputy Attorney General

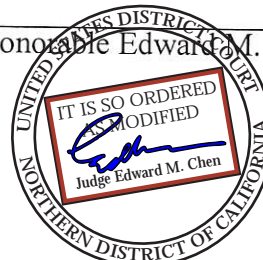
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15 *Kymerly E. Speer*
KYMBERLY E. SPEER
Deputy Attorney General
Attorneys for Defendants State of
California, by and through its California
Highway Patrol; Commissioner Joseph A.
Farrow; Officer Jose Ortega; and Officer
Timothy J. Brown

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20 **ORDER**

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22 So ordered. Parties shall show cause why CHP training materials
23 must remain confidential. Parties to file briefing

24 Dated: August 14, 2017 by 8/21/17.

25 Honorable Edward M. Chen



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